

## EXHIBIT 14

# MAO DECLARATION ISO PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

DOCUMENT SOUGHT TO BE SEALED

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ANIBAL RODRIGUEZ, et al.,

Plaintiffs,

v.

Case No.

GOOGLE LLC,

20-cv-04688-RS

Defendant.

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HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

ZOOM VIDEOTAPED DEPOSITION OF  
BELINDA LANGNER

Thursday, December 15, 2022

9:09 a.m. PST

REPORTED BY:

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WA/CO/NM-CCR

NATIONALLY CERTIFIED REALTIME

COURT REPORTER

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A P P E A R A N C E S

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VIDEOGRAPHER:

Shawna Hynes

1 with Google and the Google Ads systems. 16:41:55

2 Q. With regard to these -- these 16:41:57  
3 revenue streams, does Google make any 16:41:59  
4 money from ad conversions, tracking ad 16:42:02  
5 conversions? 16:42:08

6 A. So Google specifically and app 16:42:10  
7 campaign specifically's goal is to 16:42:15  
8 drive -- to drive users for these 16:42:18  
9 advertisers that are more likely to 16:42:22  
10 perform these specific actions. It is -- 16:42:23  
11 and we do conversion measurement as a way 16:42:28  
12 to show the value that the Google app 16:42:33  
13 campaigns have brought to a specific 16:42:36  
14 advertiser. 16:42:37

15 Q. What about conversions for when 16:42:38  
16 sWAA is off, does Google make any money 16:42:41  
17 off of that? 16:42:44

18 MR. SANTACANA: Vague. 16:42:45

19 A. I think we've sort of talked 16:42:53  
20 about the sort of app measurement concept 16:42:55  
21 already, right? So for the purposes of 16:42:57  
22 advertising, Google wants to demonstrate 16:43:00  
23 the value of our app campaigns, app 16:43:04  
24 conversion measurement allows us to 16:43:09  
25 demonstrate the value that Google Ads 16:43:10

1 drives for that specific advertiser. 16:43:13

2 BY MR. MAO: 16:43:13

3 Q. So then what's the purpose of 16:43:18

4 measuring a sWAA-off traffic for the 16:43:20

5 purposes of conversions for these revenue 16:43:23

6 streams? 16:43:28

7 A. When advertisers use app 16:43:52

8 campaigns, they want to know how well 16:43:55

9 their app campaigns are doing, just like 16:43:58

10 they would want to know how well their 16:44:00

11 campaigns on other ad networks are doing. 16:44:02

12 So across the board, advertisers do use 16:44:05

13 measurement platforms such as GA4F or 16:44:09

14 other ad app attribution partners to 16:44:15

15 measure the performance of their 16:44:20

16 campaigns, be it the Google app ads 16:44:21

17 campaigns or other campaigns. And the 16:44:26

18 whole purpose of that, right, is so that 16:44:28

19 advertisers understand how they should 16:44:31

20 distribute their budget between the 16:44:33

21 various different ad networks that they 16:44:36

22 are advertising with. 16:44:38

23 Q. And -- and they want to know 16:44:38

24 that information even when sWAA is off for 16:44:39

25 the user; isn't that correct? 16:44:42

1 A. App advertisers want to 16:44:49  
2 understand how their app campaigns are 16:44:51  
3 doing. In the context of app campaigns, 16:44:54  
4 Google is -- Google Ads provides a service 16:44:57  
5 to the advertiser to understand how their 16:45:00  
6 specific ads are performing so that they 16:45:05  
7 understand the value of their ad -- ads 16:45:08  
8 and how they are spending their ad 16:45:11  
9 budgets. 16:45:13

10 Q. Even when SWAA is off; is that 16:45:16  
11 correct? 16:45:20

12 MR. SANTACANA: Asked and 16:45:23  
13 answered. 16:45:24

14 A. As we mentioned earlier, app 16:45:28  
15 conversion measurement can happen in the 16:45:32  
16 pseudo-anonymous space when SWAA is off 16:45:38  
17 because the conversion is happening on the 16:45:43  
18 specific device. 16:45:45

19 BY MR. MAO: 16:45:45

20 Q. And advertisers want to know 16:45:48  
21 that; is that correct? 16:45:49

22 A. I mean -- 16:45:52

23 MR. SANTACANA: Objection, calls 16:45:53  
24 for speculation. 16:45:54

25 A. I -- I can't speak for 16:45:54

1	advertisers, right? But I assume they	16:45:55
2	want to know the value of their ad	16:46:00
3	campaigns, but I -- I can't speak for them	16:46:05
4	generally.	16:46:07
5	BY MR. MAO:	16:46:07
6	Q. When I go to page 7 of this, it	16:46:08
7	says "The problem: Holes in our ad	16:46:12
8	revenue tracking." You agree with me that	16:46:15
9	when there are holes in the advertisement	16:46:20
10	tracking, advertisers do not like that; is	16:46:24
11	that correct?	16:46:27
12	MR. SANTACANA: Objection,	16:46:28
13	misstates the document, calls for	16:46:28
14	speculation.	16:46:30
15	A. I mean, I -- I can't speak for	16:46:35
16	advertisers. So, you know, and --	16:46:37
17	BY MR. MAO:	16:46:37
18	Q. Sorry. Were you finished?	16:46:49
19	A. Yes.	16:46:51
20	Q. Do you know what the financial	16:46:55
21	impact on Google's ability to monetize off	16:46:57
22	of the revenue streams referenced over	16:47:08
23	back at page 5 would be if Google was not	16:47:15
24	able to measure SWAA or WAA-off traffic?	16:47:18
25	A. To the best of my knowledge, we	16:47:27

1 have never -- Google has never measured, 16:47:29  
2 you know, the impact of sWAA-off traffic. 16:47:35  
3 Q. Do you know whether or not that 16:47:40  
4 would be a negative impact or positive 16:47:42  
5 impact if Google was not able to track 16:47:45  
6 sWAA-off traffic? 16:47:50  
7 A. I wouldn't know for certain 16:47:51  
8 without doing an experiment. 16:47:52  
9 Q. Was an experiment ever 16:47:55  
10 contemplated? 16:47:58  
11 A. I don't recall serious 16:48:03  
12 discussions around an experiment around 16:48:05  
13 sWAA-off traffic. 16:48:08  
14 Q. Or WAA-off traffic; is that 16:48:09  
15 correct? 16:48:12  
16 A. I don't recall an experiment -- 16:48:13  
17 oh, I don't recall experiments being 16:48:22  
18 discussed around the impact of WAA-off or 16:48:24  
19 sWAA-off traffic to the best of my 16:48:31  
20 knowledge. 16:48:33  
21 Q. Got it. 16:48:33  
22 Can you do me a favor and my 16:48:34  
23 last questions are going to be on page 10, 16:48:37  
24 it's the majority of ad -- app ads 16:48:40  
25 revenue. 16:48:43

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CERTIFICATION

I, BELLE VIVIENNE, a Nationally  
Certified Realtime Reporter, do hereby  
certify:

That the witness whose testimony as  
herein set forth, was duly sworn by me;  
and that the within transcript is a true  
record of the testimony given by said  
witness.

I further certify that I am not  
related to any of the parties to this  
action by blood or marriage, and that I am  
in no way interested in the outcome of  
this matter.

IN WITNESS WHEREOF, I have hereunto  
set my hand this 19th day of December  
2022.

*Belle Vivienne*

BELLE VIVIENNE, CRR, CCR, RPR